

Sent: Monday, December 13, 2004 11:15 PM
To: NIEHS ICCVAM
Subject: animal testing

Dr. William Stokes, Director
NTP Interagency Center for the Evaluation of Alternative Toxicological Methods
National Institute of Environmental Health Sciences

Dear Dr. Stokes:

It was my understanding that the U.S. Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) was going to take bold, humane steps in moving the U.S. away from barbaric and antiquated animal tests. Your very name suggests that progressive thinking and creativity would be the order of the day. In fact, you seem to be committed to living in the cruel past. seems bound and determined to do just the opposite. ICCVAM's proposed position on four well-established alternatives to the Draize rabbit eye-irritation test is a good example.

While most European countries have accepted the results of these alternative tests since the mid 1990s for the purpose of identifying and classifying chemicals that cause severe eye irritation, ICCVAM has taken the bizarre and foolish position that, regardless of the result of a non-animal test, "confirmatory" testing should be carried out on animals. Your organization professes that even chemicals that exhibit corrosive or severely irritating properties *in vitro* should still be dripped or smeared into rabbits' eyes. If this is how you carry out your mission, I respectfully ask you and your associates to step aside and allow civilized, compassionate scientists to show you how to accomplish the goal.

Americans proudly boast the the U.S. is the greatest nation in the world. But words do not make us great, actions do. ICCVAM and its federal agency members need to become the world leader—rather than the weakest link—in the move away from animal testing. I urge you to:

ï Follow the example set by European countries that accept the results of these *in vitro* methods, alone or in combination, to classify severely irritating and corrosive chemicals, and should eliminate proposals for "confirmatory" testing on animals.

ï Require that background-review documents clearly address the limitations of the current animal test for eye irritation, including its subjectivity, reproducibility, and its over- and under-prediction rate. ICCVAM should not presume to "validate" a non-animal method against an animal test that has never been properly validated itself.

ï Take the time to learn that these tests are being used safely and effectively by the industry today.

ï Stop setting up obstacles to the acceptance and use of non-animal test methods in the U.S.

This is the 21st century. Please leave the past and lead us into a humane and ethical future.

Sincerely,
Marc Hoffman